

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	
)	
Plaintiff,)	
)	
v.)	The Honorable Liam O’Grady
)	
KIM DOTCOM, <i>et al.</i> ,)	12 CR 3
)	
)	
Defendants.)	

CONSENT MOTION TO CONTINUE HEARING

Movant, non-party QTS Realty Trust, Inc. (“QTS”), files this consent motion to continue the hearing on its pending motion for a protective order (ECF No. 217) on the following grounds:

1. Pursuant to Fed. R. Crim. P. 16(d)(1), non-party Carpathia Hosting, Inc. (“Carpathia”) had filed a motion for an order to protect it from undue expense and burden resulting from the continued storage of 1,103 computer servers containing 25 petabytes (25 million gigabytes) of data, which were used to provide services to Megaupload Limited (“Mega”). ECF No. 38. QTS is the successor-in-interest to Carpathia, and QTS filed a renewed motion for a protective order. ECF No. 217. The motion was noticed for a hearing on Friday, October 2, 2015 at 9:00 a.m. ECF No. 219.

2. Several other parties and non-parties have now filed responses to that motion. ECF Nos. 220, 221, 222, 223.

3. To accommodate the schedules of counsel for all the parties interested in the motion, counsel for the movant and counsel for the parties who have responded (including the

government) have conferred and consent to move the hearing date from October 2 to October 23, 2015 at 9:00 a.m.

4. The parties do not seek oral argument on this consent motion.
5. A proposed order is submitted herewith.

Wherefore, movant QTS respectfully requests that the hearing date be continued to October 23, 2015 at 9:00 a.m.

Dated: September 28, 2015

Respectfully submitted,

/s/ Christina Harrison
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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2015 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notification of such filing (NEF) to all counsel of record.

/s/ Christina Harrison

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